

Appl. No. 09/779,381

### REMARKS/ARGUMENTS

Page 2 of the Office Action indicates that the Information Disclosure Statement filed on September 19, 2001 fails to comply with the provisions of 35 CFR 1.97, 1.98, and MPEP Section 609 because no copy or listing of a reference corresponding to the diagram and description of the line card on pages 1 and 2 of the IDS has been provided.

The Examiner is advised that pages 1 and 2 of the IDS as filed include all of the information available to the Applicants regarding the noted line card. It is therefore believed that the duty to disclose information under 37 CFR 1.56 has been satisfied.

Responsive to the objection to the title on page 3 of the Office Action, the title of the present application has been amended to read "Configurable Patent and Cell Format Data Processor", which is clearly indicative of the invention to which the claims are directed.

All of the claims 1 to 7 and 21 were rejected under 35 U.S.C. 103(a) as being unpatentable over Kao (United States Patent 6,535,513) in view of Zheng (United States Patent 6,611,522).

Regarding claims 1 and 5 to 7, pages 3 and 4 of the Office Action assert that Kao discloses in Figure 2 a line card 202 in switching apparatus 102 coupled to a first interface to an ATM or IP network. Received data is supplied to a local switch module 206 that is coupled to a cell switching fabric 208. It is also alleged in the Office Action that Kao discloses a multitude of configurations for interfacing networks of varying speeds and media types whereby ATM or IP data is received on the first interface and converted to ATM cells for output on the second interface to the switch fabric 208, and that Kao shows ATM switching among the line cards interfaced to the switch fabric, with switched cells being received at a destination line card from the switch fabric on the second interface, converted to the outgoing media type, and outputted on the first interface to the ATM or IP network.

With reference to independent claim 1 of the present application, this claim recites an integrated circuit on a line card in a router, the line card having a first interface through which the

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line card is couplable to either a cell network or a packet network, the line card having a second interface through which the line card is coupled to a switch fabric of the router.

It is respectfully submitted that Kao fails to disclose at least these claimed features.

Figure 2 of Kao does not show any interfaces on the line cards 202 and 204. The line cards 202 and 204 are shown in detail in Figure 6 of Kao, and include separate and distinct IP and ATM interfaces 618 and 620. Therefore, Kao does not disclose an integrated circuit on a line card which has a first interface through which the line card is couplable to either a cell network or a packet network. Kao discloses line cards with respective IP and ATM interfaces.

According to claim 1, the integrated circuit is also configurable in a first way such that the line card receives data in cell format from a cell network via the first interface, in a second way such that the line card receives data in packet format from a packet network via the first interface, in a third way such that the line card outputs data in cell format via the first interface to the cell network, and in fourth way such that the line card outputs data in packet format via the first interface. As Kao fails to disclose a line card interface which is couplable to either a cell network or a packet network, these further claimed features are also absent from Kao.

On page 5 of the Office Action, it is acknowledged that Kao does not explicitly disclose the implementation of line card switching apparatus on an integrated circuit. Reference is then made to Zheng as disclosing in Figure 4 application specific integrated circuits (ASICs) on line cards. Zheng, however, does not remedy the above-noted deficiency of Kao, as Zheng also fails to disclose or suggest a line card interface which is couplable to either a cell network or a packet network.

On a further note, it is respectfully submitted that there would not be a motivation to combine Kao and Zheng in the manner suggested on page 5 of the Office Action. Neither Kao nor Zheng provides any motivation for a person skilled in the art to make this combination. The Office Action presents only a somewhat circular argument to the effect that a person skilled in the art would adapt that apparatus of Kao for implementation though an integrated circuit for receiving multiple flows of cell and packet data in the same wavelength band on fiber optic cable, because implementation on an integrated circuit would provide efficient input and output

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processing of multiple flows over the same wavelength band. Applicant believes that this does not constitute a proper motivation to combine, as is required to demonstrate a bona fide case of obviousness.

Claims 2 to 5 and 21 depend from claim 1 and therefore also include the above features.

Independent claims 6 and 7 similarly recite an integrated circuit on a line card having a first interface through which the line card is couplable to either a cell network or a packet network. The integrated circuit in claim 6 is configurable in a first way such that the line card receives data in cell format from the cell network via the first interface and in a second such that the line card receives data in packet format from the packet network via the first interface. According to claim 7, the integrated circuit is configurable in a first way such that the line card outputs data in cell format via the first interface and a second way such that the line card outputs data in packet format via the first interface.

Kao fails to disclose the claimed interface, as discussed in detail above. Zheng similarly fails to disclose such an interface. There is also no motivation to combine Kao and Zheng. It is thus respectfully submitted that rejected claims 1 to 7 and 21 are not obvious in view of the cited references, and are allowable. Reconsideration and withdrawal of the obviousness objections under 35 U.S.C. 103(a) are respectfully requested, and allowance of the application is earnestly solicited.

In view of the foregoing, early favorable consideration of this application is requested.

Respectfully submitted,

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